

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SERGEANT DANIEL LANGFORD, DETECTIVE  
THOMAS BARKER, POLICE OFFICER JOHN  
NORDONE, POLICE OFFICER MITCHELL  
SERLIN, DETECTIVE KENNETH HASKO and  
DETECTIVE MARK CAREY,

**DEFENDANT'S  
RULE 26 (a)  
DISCLOSURES**

07 Civ. 8413 [CLB]  
ECF Case

Plaintiffs,

- against -

THE COUNTY OF WESTCHESTER and  
WESTCHESTER COUNTY DEPARTMENT OF  
PUBLIC SAFETY,

Defendants.

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COUNSELORS:

Defendant County of Westchester (also named herein as "Westchester County Department of Public Safety"), by its attorney Charlene M. Indelicato, Westchester County Attorney, hereby identifies the following individuals and documents pursuant to Rule 26(a) of the Federal Rules of Civil Procedure:

(A) The following individuals, in addition to the named Plaintiffs, are likely to have discoverable information that Defendant may use to support its defenses:

1. Lieutenant Richard Daubman  
Special Operations Division  
Westchester County Department of Public Safety Services  
One Saw Mill River Parkway  
Hawthorne, New York 10523  
(914) 864-7890

Information concerning canine-related work allegedly performed by Plaintiffs and Department procedures concerning canine handling activities.

2. Captain Paul Stasaitis  
Commanding Officer, Special Operations Division  
Westchester County Department of Public Safety Services  
One Saw Mill River Parkway  
Hawthorne, New York 10523  
(914) 864-7890

Information concerning canine-related work allegedly performed by Plaintiffs and Department procedures concerning canine handling activities.

3. Sergeant Charles Geraci  
Westchester County Department of Public Safety Services  
One Saw Mill River Parkway  
Hawthorne, New York 10523  
(914) 864-7890

Information concerning canine-related work performed by Plaintiffs and Department procedures concerning canine handling activities.

4. Donna Ritucci  
Director of Administrative Services  
Westchester County Department of Public Safety Services  
One Saw Mill River Parkway  
Hawthorne, New York 10523  
(914) 864-7890

Information concerning sums paid and/or reimbursed to Plaintiffs for on and off-duty canine-related duties.

5. Leonard G. Spano  
Former President, Westchester County Police Benevolent Association  
One Saw Mill River Parkway  
Hawthorne, New York 10523  
(914) 864-7890

Information concerning negotiations, collective bargaining agreements and stipends issued to canine handlers.

6. Police Officer Michael Hagan  
President, Westchester County Police Benevolent Association  
One Saw Mill River Parkway  
Hawthorne, New York 10523  
(914) 864-7890

Information concerning negotiations, collective bargaining agreements and stipends issued to canine handlers.

7. Michael Wittenberg  
35 Sunnyside Avenue  
Pleasantville, New York 10570

Information concerning collective negotiations, collective bargaining agreements and stipends issued to canine handlers.

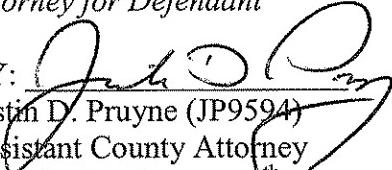
(B) The following documents are in possession, custody or control of County Defendants and may be used by Defendants to support their defenses:

1. Collective bargaining agreements and or Interest Arbitration Awards entered into by the County of Westchester and the Westchester County Police Benevolent Association.
2. Invoices, vouchers, petty cash forms, purchase orders and/or purchase cards and/or receipts and/or other requests for reimbursement or payment submitted by Plaintiffs and/or canine-related service(s) providers.
3. Personnel transaction forms of the Westchester County Department of Human Resources concerning Plaintiffs.
4. Department fleet management records concerning assigned vehicles.
5. Overtime slips submitted by Plaintiffs.
6. Department Operations Order No. 2000-50.
7. Department Standard Operating Procedure No. 74.10.
8. Plaintiff Langford's Memorandum to Lieutenant Richard Daubman dated June 19, 2006, with attachments.
9. Opinion and Award regarding line of duty injury determination dated April 9, 2007 (Case No. PF 278002) and related documentation.

Defendant reserves its right to supplement and/or amend the foregoing responses.

Dated: White Plains, New York  
December 4, 2007

CHARLENE M. INDELICATO  
Westchester County Attorney  
*Attorney for Defendant*

BY:   
Justin D. Pruyne (JP9594)  
Assistant County Attorney  
148 Martine Avenue, 6<sup>th</sup> Floor  
White Plains, New York 10601  
(914) 995-5102

To: Gregory Kuczinski, Esq. (GK 3191)  
Kucincki, Vila & Associates, LLP  
220 White Plains Road, Suite 220  
Tarrytown, New York 10591